

EXHIBIT A

JENNIFER GROSSMAN, RN, BSN, LNC

413.218.5092 JGROSSMANLNC@GMAIL.COM

October 13, 2021

Wiggin and Dana, LLP
265 Church Street
New Haven, Connecticut 06510

Attn: Kevin Carroll
Re: Didier Kindambu

Attorney Carroll,

Per your request, I have reviewed Mr. Didier Kindambu's medical records in order to explain his past medical history, diagnoses and treatments. The report is based on 415 pages of medical records provided in part by Alexandria Detention Center. The medical records reviewed covered dates from October 20, 2020 to June 8, 2021 but were incomplete as evidenced by a total lack of lab test results, radiology results and the last Chart Note entry being on May 1, 2021. Additionally, there are no medical records from before Mr. Kindambu was incarcerated. This has been noted in the report which follows.

Sincerely,



Jennifer Grossman, RN, BSN, LNC

License #571124

Report on the Medical Condition of Didier Kindambu, D.O.B. 08/05/1971

This report is based on 415 pages of medical records provided in part by Alexandria Detention Center. The medical records reviewed covered dates from October 20, 2020 to June 8, 2021. The medical records were incomplete as evidenced by a complete lack of lab test results and radiology results. Additionally, the last Chart Note entry is dated May 1, 2021 and there are no medical records prior to Mr. Kindambu being incarcerated. The author reserves the right to edit this report should additional records be made available.

Didier Kindambu's Medical History

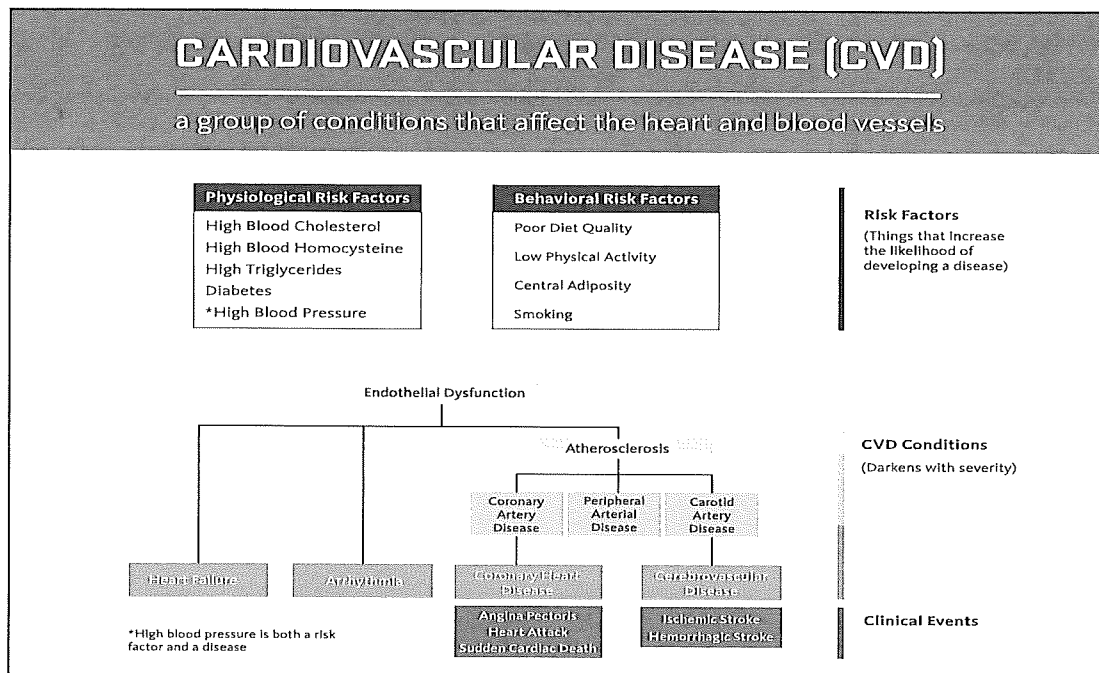
Mr. Didier Kindambu is a fifty-year-old Black man with a medical history of insulin dependent diabetes and cardiovascular disease (heart disease), including hypertension (high blood pressure) and high cholesterol.

Cardiovascular Disease

Mr. Kindambu suffers from a number of chronic diseases including hypertension and high cholesterol. These chronic diseases, when left untreated or uncontrolled, lead to cardiovascular disease, also known as heart disease. Cardiovascular disease (CVD) is an umbrella term that refers to several types of heart conditions that can result in heart attack, heart failure, a cardiac arrhythmia or stroke. CVD is the leading cause of death in the United States, but most people don't know that they have cardiovascular disease until they suffer a specific symptom, such as chest pain. This is why annual physicals and blood tests with primary care doctors are so important; preventative testing and thorough treatment of chronic health issues such as high blood pressure and high cholesterol are vital to a person's overall health, quality of life, and life expectancy.^{1 2}

¹ "Prevent Heart Disease." *Centers for Disease Control and Prevention*, Centers for Disease Control and Prevention, 21 Apr. 2020, <https://www.cdc.gov/heartdisease/prevention.htm>.

² "Prevention & Wellness." *AAFP Home*, 5 Dec. 2019, <https://www.aafp.org/family-physician/patient-care/prevention-wellness.html>.



High cholesterol is diagnosed when a blood test shows that a person has too much of a specific fat in their blood stream.³ In high levels, cholesterol can increase the risk of heart disease by forming plaque.^{4 5} As plaque builds, it eventually blocks the blood vessels, making the heart work much harder to move blood through those blood vessels. This causes high blood pressure. If the vessel becomes completely clogged the person can have a heart attack, which is when heart muscle starts to die from a lack of blood. Plaque can also break off and travel to the brain, lungs or heart causing a stroke, pulmonary embolism or a heart attack.

Despite the detrimental effects of high cholesterol, Mr. Kindambu has not been prescribed a cholesterol lowering medication. Both high cholesterol and high blood pressure can

³ American Heart Association Editorial Staff. "Prevention and Treatment of High Cholesterol (Hyperlipidemia)." *Www.heart.org*, <https://www.heart.org/en/health-topics/cholesterol/prevention-and-treatment-of-high-cholesterol-hyperlipidemia>.

⁴ Pickering, Thomas G. "Should Hypertensive Patients Take Aspirin? A Report From the FDA." *Medscape*, 25 Mar. 2004, <https://www.medscape.com/viewarticle/471490>.

⁵ Mayo Clinic Staff. "High Cholesterol." *Mayo Clinic*, Mayo Foundation for Medical Education and Research, 20 July 2021, <https://www.mayoclinic.org/diseases-conditions/high-blood-cholesterol/symptoms-causes/syc-20350800#:~:text=Cholesterol is a waxy substance, deposits in your blood vessels>.

occur due to lifestyle choices but can also be related to genetics (Mr. Kindambu has a family health history of hypertension), and is much more common in Black men.^{6 7}

Normal blood pressure for an adult is 120/80. Per the Journal of the American College of Cardiology's (ACC) clinical practice guidelines, a person should be diagnosed with high blood pressure when their blood pressure readings are consistently 130/80 or higher.⁸ For a person like Mr. Kindambu who also has diabetes, clinical guidelines state that hypertension medication treatment goals should be to keep blood pressure below 130/80 and the International Society on Hypertension in Blacks (ISHIB) Consensus Statement reiterates this.⁹ The ACC also advises that adults with stage two hypertension be treated with two antihypertensive drugs of different classes.^{10 11} Mr. Kindambu takes three medications to treat his high blood pressure: amlodipine, hydrochlorothiazide (HCTZ), and losartan. Despite these three medications, Mr. Kindambu's blood pressure is regularly above the recommended 130/80.

In October of 2020, Mr. Kindambu's blood pressure was taken 12 times. Out of those 12 blood pressure readings, only two were normal (120/80 or lower) and six of them were higher than 130/80. On October 22, 2020 Mr. Kindambu's blood pressure was 145/104 and two days later it was 153/90. In November of 2020 Mr. Kindambu's blood pressure was taken 20 times and again, only two of those readings were normal, with 13 of them being above 130/80. On

⁶ "African Americans and Heart Disease, Stroke." *Www.heart.org*, <https://www.heart.org/en/health-topics/consumer-healthcare/what-is-cardiovascular-disease/african-americans-and-heart-disease-stroke>.

⁷ Carnethon, Mercedes R., et al. "Cardiovascular Health in African Americans: A Scientific Statement From the American Heart Association." *Circulation*, 23 Oct. 2017, <https://www.ahajournals.org/doi/full/10.1161/CIR.0000000000000534>.

⁸ Whelton, Paul K., et al. "2017 ACC/AHA/AAPA/ABC/ACPM/AGS/APhA/ASH/ASPC/NMA/PCNA Guideline for the Prevention, Detection, Evaluation, and Management of High Blood Pressure in Adults: A Report of the American College of Cardiology/American Heart Association Task Force on Clinical Practice Guidelines." *Journal of the American College of Cardiology*, 1 May 2018, https://www.jacc.org/doi/abs/10.1016/j.jacc.2017.11.006?_ga=2.86879320.1182640551.1528306905-1524800955.1528306905&.

⁹ Flack, John M., et al. "Management of High Blood Pressure in Blacks." *Hypertension*, vol. 56, no. 5, 2010, pp. 780–800., <https://doi.org/10.1161/hypertensionaha.110.152892>.

¹⁰ "2017 Guideline for High Blood Pressure in Adults." *American College of Cardiology*, <https://www.acc.org/latest-in-cardiology/ten-points-to-remember/2017/11/09/11/41/2017-guideline-for-high-blood-pressure-in-adults>.

¹¹ American Heart Association Editorial Staff. "Types of Blood Pressure Medications." *Www.heart.org*, <https://www.heart.org/en/health-topics/high-blood-pressure/changes-you-can-make-to-manage-high-blood-pressure/types-of-blood-pressure-medications>.

November 18, 2020 Mr. Kindambu's blood pressure was 157/93. The following day, his blood pressure was 155/98 and on November 20, 2020 his amlodipine prescription was increased. The following month 21 of 31 blood pressure readings in were normal, however, his blood pressure was only taken nine times between February 9, 2021 and May 7, 2021 with none of them being normal and only one being below 130/80.

When a person's blood pressure is regularly above the recommended levels, it is considered to be uncontrolled, regardless of whether or not they are on medication. The American College of Cardiology states that screening for uncontrolled hypertension in adults should include testing for chronic kidney disease, renovascular disease, primary aldosteronism, obstructive sleep apnea, drug-induced hypertension and alcohol induced hypertension. This is because uncontrolled high blood pressure can lead to heart attack, stroke, aneurysm, heart failure, kidney failure, vision loss, trouble with memory, and dementia.¹² Mr. Kindambu's medical records do not show that he has undergone any such testing. Additionally, Mr. Kindambu's average pulse pressure is over 50 mmHg, which makes him at an increase for heart disease, heart rhythm disorders, and stroke.¹³ Higher pulse pressures are also thought to contribute to both eye and kidney damage.

Diabetes Mellitus

Mr. Kindambu has a diagnosis of diabetes mellitus and is on two types of insulin, one is long-acting and the other is short-acting. Insulin regimens are used to keep blood sugar levels within range, therefore minimizing the damage that high blood sugar levels can have on the body. When blood sugar levels are elevated, blood vessel and nerves are injured. This damage causes limb pain, infection, and vision loss. High blood sugar can also cause kidney damage, depression, weakens the immune system, and leads to heart disease.¹⁴

¹² "High Blood Pressure (Hypertension)." *Mayo Clinic*, Mayo Foundation for Medical Education and Research, 1 July 2021, <https://www.mayoclinic.org/diseases-conditions/high-blood-pressure/symptoms-causes/syc-20373410>.

¹³ "Pulse Pressure: What It Is and How to Calculate It." *Cleveland Clinic*, <https://my.clevelandclinic.org/health/symptoms/21629-pulse-pressure>

¹⁴ "Long-Term Complications of Diabetes: MedlinePlus Medical Encyclopedia." *MedlinePlus*, U.S. National Library of Medicine, <https://medlineplus.gov/ency/patientinstructions/000327.htm>.

Diabetic insulin regimens are personal and complex, with adjustments being made depending on a person's blood glucose level, what food is being eaten, if the person is ill, exercising, or has an infection. There are five main types of insulin (rapid-acting, regular or short-acting, intermediate-acting, long-acting, and ultra-long-acting) that differ in the time of onset, peak strength, and duration.¹⁵

Despite being on two types of insulin, Mr. Kindambu's blood sugar levels have been high as evidenced by his HbA1c test result of 10.8% on February 9, 2021. The HbA1c test gives an average of a person's blood sugar levels over the previous three months. A non-diabetic's HbA1c result would normally be below 5.7%, while an HbA1c of 6.5% or higher would trigger a diabetes diagnosis.¹⁶ A person who has a diagnosis of diabetes is usually advised to keep their HbA1c below 7% in order to reduce the aforementioned damage that is caused by elevated blood sugar levels. An HbA1c test of 10.8% shows that Mr. Kindambu's blood sugar has not been adequately controlled while incarcerated from November 2020-January 2021.

Conclusion

In general, the world has treated chronic diseases such as hypertension and diabetes as "normal" parts of being alive. Diseases that are to be expected, medicated, and forgotten. The global SARS-CoV-2 pandemic took aim at people with these diseases, suddenly making those with hypertension or diabetes extremely high-risk for a severe case of COVID-19 and possibly death. Black and Latinx people with these diseases were the majority of people who died from COVID-19.

This spring vaccines became available and Mr. Kindambu was lucky that his case of COVID-19 was not severe. It is doubtful that he still has enough antibodies from that infection to help him were he to be exposed to the Delta variant and having both his cardiovascular disease and diabetes not being controlled puts him at a much higher risk.

¹⁵ "Insulin Basics." *Insulin Basics* | ADA, <https://www.diabetes.org/healthy-living/medication-treatments/insulin-other-injectables/insulin-basics>.

¹⁶ "Hemoglobin A1C (HbA1c) Test: MedlinePlus Medical Test." *MedlinePlus*, U.S. National Library of Medicine, 15 Sept. 2021, <https://medlineplus.gov/lab-tests/hemoglobin-a1c-hba1c-test/>.

Healthcare providers around the world had hoped that the pandemic would be a wake-up call for the general public and that it would encourage them to take primary care and preventative health care seriously. Chronic diseases, even when treated, cause major, lasting damage to the body and drastically shorten life-span by 12-23 years.¹⁷ Left untreated the effects are even more drastic. Mr. Kindambu is in need of immediate adjustments to his primary care treatment plan. Without monitoring, testing and control of his cholesterol, hypertension and diabetes he is at risk for organ damage, vision loss, a major cardiac or brain injury and death.

Sincerely,

A handwritten signature in black ink, appearing to read 'JGrossman', with a long horizontal flourish extending to the right.

Jennifer Grossman, RN, BSN, LNC

License #571124

¹⁷ “Preventable Diseases Shorten Lifespan.” *WorldHealth*, <https://www.worldhealth.net/news/preventable-diseases-shorten-lifespan/>.